



## **Air Quality Permitting Statement of Basis**

**December 21, 2007**

**Tier I Operating Permit No. T1-2007.0103**

**Potlatch Forest Products Corporation  
Lumber Drying Division  
St. Maries**

**Facility ID No. 009-00030**

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**DRAFT FOR PUBLIC COMMENT**

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Available Control Technology
mmbf	million board feet
MMBtu/hr	Million British thermal units per hour
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
OSU	Oregon State University
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **1. PURPOSE**

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Potlatch Forest Products Corporation regarding the operation of its lumber drying facility located in St. Maries. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.313.03.

## **2. FACILITY DESCRIPTION**

The Lumber Drying Division in St. Maries dries dimensional lumber. The facility consists of a wood and wood waste-fired boiler (the Hurst boiler) and four 68-foot-long, double-track, steam-heated lumber dry kilns. Steam used in the drying process is provided by the Hurst boiler, which combusts hog fuel and shavings from the St. Maries Complex (located on the Coeur d'Alene Indian Reservation) lumber sawmill. To control emissions, exhaust gas passes through a multiclone and an electrostatic precipitator (ESP) with two transformer rectifiers. Rated at about 49 MMBtu/hr, the boiler produces up to 34,500 pounds of steam per hour.

Lumber is transported to the site via trucks. The lumber typically consists of Douglas Fir, Western Red Cedar, Grand Fir, and Hemlock, with smaller amounts of Lodgepole Pine, Subalpine Fir, and Engelmann Spruce. The facility is also capable of drying Ponderosa Pine and White Pine. Lumber is unloaded from trucks and placed in green storage or loaded on to the in-feed tracks of the kilns. When a charge is created, it is pushed into the kilns, the doors are shut, and the charge is placed on an appropriate schedule (or recipe). Emissions from the kilns are uncontrolled. The kilns typically process about 90 million board feet (mmbf) per year.

When drying is completed, the load is pushed out and downloaded to a waiting truck or to dry storage. Temperatures reach 190°F and the target moisture content of the wood is 19 percent or less. All lumber dried at the Lumber Drying Division is trucked to the planer facility at the St. Maries Complex lumber mill. The lumber is then dressed, graded, and packaged for shipment.

## **3. FACILITY/AREA CLASSIFICATION**

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Refer to Section 6.2 of this document for a complete emissions inventory of the air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.30.

This facility is not a major facility as defined by IDAPA 58.01.01.205 because it does not emit or have the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 2421, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in St. Maries, which is classified as unclassifiable for all criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone). There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 62 and Universal Transverse Mercator (UTM) Zone 11.

#### 4. APPLICATION SCOPE

The scope of this application is as follows:

- Renew the facility's Tier I operating permit
- Consider the lumber drying division a separate facility from the Saint Maries Complex which is on the Coeur d'Alene Indian Reservation.
- Remove the oil and edge seal operation section from the Tier I operating permit as the process has been removed from the facility.

#### 5. SUMMARY OF EVENTS

June 25, 2007	DEQ receives application
August 24, 2007	DEQ determines application complete
October 3, 2007	DEQ issues revised Tier II operating permit which removes oil and edge seal PTC as requested by the facility prior to issuance of the draft Tier I operating permit
November 8, 2007	DEQ receives corrected Tier I operating permit application information
November 9, 2007	DEQ issues facility draft Tier I operating permit
December 18, 2007	DEQ receives comments from facility on facility draft permit

##### 5.1 *Permitting History*

July 21, 1999	PTC No. 009-00001, issued July 21, 1999, for the oil and edge seal process (Note: This PTC was inadvertently issued with the number for the Potlatch St Maries Complex that is on the Coeur d'Alene Indian Reservation. However, the permit applies to the lumber drying facility, which is located outside of the Coeur d'Alene Indian Reservation.)
December 24, 2002	Initial Tier I Operating Permit No. 009-00030, issued December 24, 2002
May 12, 2004	Tier II Operating Permit and PTC No. T2-020121, issued May 12, 2004. Facility-wide operating permit and PTC for Hurst boiler, four lumber drying kilns, and oil and edge seal process.
July 21, 2005	Tier II Operating Permit and PTC No. T2-040124, issued July 21, 2005. Added a CAM plan for the ESP: replace the upper and lower power input range. Name change from Potlatch Corporation to Potlatch Forest Products Corporation.
September 27, 2006	Tier I Operating Permit No. T1-040125, issued September 27, 2006. Incorporated T2-040124.
October 3, 2007	Tier II Operating Permit and PTC No. T2-2007.0183, issued October 3, 2007. PTC termination for oil and edge seal process.

## 6. PERMIT ANALYSIS

### 6.1 Basis of Analysis

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I Operating Permit application, received June 25, 2007
- Tier II Operating Permit and PTC No. T2-2007.0183, issued October 3, 2007
- Tier I Operating Permit No. T1-040125, issued September 27, 2006
- Compliance certification received June 25, 2007
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

### 6.2 Emissions Description and Emissions Inventory

The emissions from the Hurst boiler are limited by the steaming rate limits, and PM emissions are further limited and controlled by a multiclone and an electrostatic precipitator. The boiler has not been tested for pre-control emissions. Therefore, the uncontrolled potential to emit for PM<sub>10</sub> was indicated as greater than the controlled emission rate.

The emissions from the kilns are estimated at a throughput of 102 MMbf/yr. The throughput is not limited by permit. The throughput is limited by the mix of the available resources that are within a financially viable geographic distance of the facility, according to the permit application. A DEQ inspection of the facility's throughput records found that the throughput was below 102 MMbf/yr.

Table 6.1 Uncontrolled Potential to Emit, Criteria Pollutants

Source	PM <sub>10</sub>		NO <sub>x</sub>		SO <sub>2</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Hurst boiler <sup>a</sup>	>5.7	>25.1	8.4	36.7	0.16	0.7	6.5	28.6	0.08	0.4
Lumber drying kilns	0.93	4.1	---	---	---	---	---	---	19.8	86.7
Total:	>6.6	>29	8.4	36.7	0.16	0.7	6.5	28.6	19.9	>87.1

<sup>a</sup> Emission estimates based on source test data

For the TAP/HAP from kilns, the wood type with the highest emissions of each TAP was used to estimate emissions in Table 6.2. The factors were based on factors from May 2005 tests done by Oregon State University (OSU), a September 2000 OSU report, and factors from the Olympic Region Clean Air Authority, Olympia, Washington.

The TAP analysis for the boiler used emission factors compiled from selected source test data that was used in developing the AP-42 factors. The published factors were not used. An explanation of the origin of the factors used is copied as follows from the August 15, 2007, e-mail from the facility's consultant: *"The emission factors used to calculate toxic and hazardous air pollutant emissions from the Hurst boiler in the Potlatch - St. Maries Tier I permit application were based on source tests used to develop emission factors for AP-42 Section 1.6. Whereas the EPA combined all source test data to calculate the AP-42 emission factors regardless of control technology, the emission factors used here were calculated using a subset of the source tests where wood-fired boilers were controlled by ESPs. The subset used to calculate the hydrogen chloride (HCl) emission factor was further reduced by removing source tests performed on units burning municipal solid waste. In cases where the AP-42 source test database did not include any ESP-equipped boilers, we averaged other source tests in diminishing order or preference: fabric filter (FF), wet scrubber (WS), mechanical collector (MC),*

uncontrolled (U), and not reported (NR). These codes are provided for each compound in column H of the attached spreadsheet.”

The total boiler HAP emissions based on the emission factors derived as described are 2.31 tons per year.

Table 6.2 shows the uncontrolled TAP/HAP potential to emit from the kiln.

Table 6.2 Uncontrolled Potential to Emit, Kiln TAP/HAP

Source	Acetaldehyde		Formaldehyde		Methanol		Phenol	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Lumber drying kilns	0.54	2.35	0.05	0.20	2.03	8.89	0.05	0.20

Table 6.3 shows the controlled potential to emit from all permitted point sources.

Table 6.3 Controlled Potential to Emit

Source	PM <sub>10</sub>		NO <sub>x</sub>		SO <sub>2</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Hurst boiler <sup>a</sup>	5.7	25.1	8.4	36.7	0.16	0.7	6.5	28.6	0.08	0.4
Lumber drying kilns	0.93	4.1	---	---	---	---	---	---	19.8	86.7
Total:	6.6	29.2	8.4	36.7	0.16	0.7	6.5	28.6	19.9	87.1

<sup>a</sup> Emission estimates based on source test data

Emissions are limited by grain loading, opacity, process weight rate, and steam production limits.

For the purpose of source classification for the AIRS database, the emissions from both parts (Indian reservation and state land) of the facility need to be considered because the two parts are one facility. Therefore, emissions information for the whole facility was taken from the Part 71 permit application updates submitted by the facility to EPA on November 27, 2001 and in April 2006. This information represents emissions from the portion of the facility on the Coeur d'Alene Indian Reservation (St. Maries Complex) and the portion of the facility on state land (Lumber Drying Division). This data has not been verified and is used only for AIRS classification purposes.

Table 6.4 Facility (St. Maries Complex and Lumber Drying Division, combined) Emissions Summary

Source	PM <sub>10</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	VOC	HAP	Methanol
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Facility emissions in 2001	158 <sup>a</sup>	88 <sup>a</sup>	23 <sup>b</sup>	663 <sup>a</sup>	132 <sup>a</sup>	28 <sup>a</sup>	13 <sup>a</sup>
Oil and edge seal, 2006	---	---	---	---	39.9 <sup>b</sup>	---	---
Lumber drying kiln, 2006	2.48 <sup>b</sup>	---	---	---	24.30 <sup>b</sup>	---	---
Total:	160	88	23	663	196.2	28	13

<sup>a</sup> Actual Emissions

<sup>b</sup> Potential to Emit

## 7. REGULATORY ANALYSIS

### 7.1 IDAPA 58.01.01.313.03 – Renewals of Tier I Operating Permits

This permitting action is required to renew the existing Tier I operating permit because the permit expires on December 24, 2007. Renewal applications are subject to the requirements of IDAPA 58.01.01.313.

## **7.2 New Source Performance Standards (NSPS) – 40 CFR 60**

Subpart Dc – The Hurst boiler was installed before the 1989 applicability date and has not been modified.

## **7.3 National Emission Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Parts 61 & 63**

Subpart DDDD – Plywood and Composite Wood Products

This subpart applies to lumber kilns at any facility that is a major source of HAPS, so it applies to this facility. For kilns, only the initial notification requirements in Section 63.9(b) apply. The permit application states that Potlatch Forest Products Corporation notified EPA of applicability on January 18, 2005. Because the required notification has been made, no permit requirement will be written in this permit.

On June 19, 2007, the D.C. Circuit Court of Appeals vacated and partially remanded a portion of EPA's Maximum Achievable Technology Standards (MACT) for the Plywood and Composite Wood Products source category. Only the low risk option and the automatic compliance extension to October 1, 2008 were vacated. The initial notification requirements still apply.

Subpart DDDDD – Boiler MACT

This subpart applies to the Hurst boiler. The subpart was vacated on June 8, 2007. Section 112(j) applies. DEQ is waiting for further guidance from EPA regarding the deadline and timing of 112j as it applies to the fully vacated MACTs.

## **7.4 Compliance Assurance Monitoring – 40 CFR 64**

The lumber drying facility and the St. Maries complex are a single facility for the purposes of facility classification. The emissions from the whole facility (both locations) exceed major source thresholds, so the lumber drying operations are part of a facility subject to Title V permitting. The facility operates a boiler with pre-control PM emissions which exceed the 100 T/yr major source threshold, control devices are used to maintain compliance with the PM limits, and it is not exempt according to the 40 CFR 64 exemption criteria. Therefore, CAM applies to the multiclone and the ESP that control PM emissions from the Hurst boiler.

CAM requirements were established in the original Tier I operating permit. A PM test was done on July 25, 2006, to assess the emission rate for the now-vacated boiler MACT, 40 CFR 63 Subpart DDDDD. The PM measured was 0.011 gr/dscf at a steam production rate of 30,100 lb/hr (rated at 34,500 lb/hr) and an ESP secondary power of 1.9 kW. The PM limit for a wood-fired boiler is 0.08 gr/dscf. The tested emission rate is well below the limit.

## **8. PERMIT CONDITIONS**

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions are identified as "Existing Permit Conditions", and revised permit conditions are identified as "Revised Permit Conditions."



## ***General***

The facility requested that the lumber drying division be considered a separate facility from the Saint Maries Complex, which is on the Coeur d'Alene Indian Reservation. The determination was made in the original Tier I operating permit action by DEQ and EPA that the St. Maries' facility, which includes equipment and processes which are adjacent, but part is on land that is regulated by the State of Idaho and part is on the Coeur d'Alene Indian Reservation which is regulated by the EPA, are two parts of the same facility. The regulations and policies regarding determining if a facility is one facility or two facilities have not changed since the original decision was made. There was no discussion in the application about the findings that must be made to determine that the facility is two separate facilities. Two facilities are considered one if there is common control, if they have the same industrial grouping (SIC), and are contiguous or adjacent (can be separated by several miles if there is dedicated conveyance, for example). There are many EPA determinations that have been made on this issue for different facilities that can be referenced for examples of the process and decisions when requesting that the Potlatch Forest Products Corporation St. Maries Complex and the lumber drying division be considered two separate facilities.

The facility also requested that the oil and edge operation permit conditions not be included in the renewed Tier I operating permit because the process has been removed. The Tier II permit was modified and issued on October 3, 2007 which terminates the PTC for the oil and edge seal process and removes those PTC references and requirements from the Tier II operating permit. Therefore, the oil and edge seal requirements are not in this Tier I renewal.

## ***Regulated Sources***

### **8.1 Table 1.1**

The fuel description for the Hurst boiler was changed from "wood and wood waste" to "wood residual" as requested by the facility.

## ***Facility-Wide Conditions***

### **8.2 Sulfur Content**

Permit Condition 2.14 applies to distillate fuel and coal. This permit condition was removed from the permit because the facility does not use distillate fuel or coal.

### **8.3 Open Burning**

Permit Condition 2.15 applies to open burning which cannot be done at the facility. Therefore, the permit condition was removed.

## ***Emissions Unit 1 –Hurst Boiler***

### **8.4 Renumbering and Relocation of Permit Conditions**

Permit conditions for the Hurst boiler have been renumbered for clarity, numbering the permit conditions in the format "3.XX" and eliminating numbers that have been listed as "reserved" in the existing permit. The grain loading and opacity limits are in the facility-wide section and have been removed from the Hurst boiler section to avoid duplication of permit conditions.

## **8.5 CAM Monitoring Clarification**

Permit Condition 3.12 was modified to clarify that the maintenance of the monitoring applies to the ESP.

## **8.6 Revised Permit Condition 3.26**

The facility requested that Permit Conditions 3.1, 3.6, 3.7, 3.8, 3.20, and 3.21 be removed from Permit Condition 3.26.

Permit Condition 3.26 is as follows:

*“If the automatic voltage control (AVC) setting on the ESP is changed, the permittee shall conduct a PM source test in accordance with IDAPA 58.01.01.157 to demonstrate compliance with Permit Conditions 2.7, 2.13, 3.1, 3.6, 3.7, 3.8, 3.20, and 3.21.”*

Permit Conditions 3.7, 3.20, and 3.21 contain instructions for conducting a test. Permit Condition 2.10 also contains instructions for testing, but does not require a test protocol. Permit Condition 3.20 requires a test protocol but only for tests done in accordance with Permit Conditions 3.6 and 3.8. The requirements from Permit Condition 3.21 are contained in Permit Condition 2.10. Permit Condition 2.10 also contains the requirement to test in accordance with IDAPA 58.01.01.157. Therefore, to clarify what is required for the test that is required to be done after changing the AVC settings, Permit Conditions 2.10 and 3.7 are referenced.

Permit Conditions 3.1 and 3.6 define the steaming rate limit and contain provisions for source testing that can be done to modify the steaming rate limit. Permit Condition 3.8 allows testing to show compliance with Permit Conditions 2.7 and 2.13 while operating using only one T/R set. The results of the source test are required to show compliance with Permit Conditions 2.7 and 2.13. Changing the AVC setting could change the emissions that were previously tested that showed compliance with the applicable opacity and emission limits when establishing the steaming rate limit. If the boiler is to be operated using only one T/R set, then the steaming rate must be re-established for that, also. The previous tests may not be representative of the emissions. Revised Permit Condition 3.26 is as follows:

*“After any change of the automatic voltage control (AVC) setting on the ESP, the permittee shall conduct a PM source test in accordance with Permit Conditions 2.10 and 3.7 to demonstrate compliance with Permit Conditions 2.7 and 2.13. After any change of the AVC setting on the ESP and prior to operating only one of the T/R sets, the permittee shall conduct a PM source test in accordance with Permit Conditions 2.10 and 3.7 to demonstrate compliance with Permit Conditions 2.7 and 2.13 when operating only one of the T/R sets on the ESP.”*

## ***Emissions Unit 2 – Lumber Drying Kilns***

### **8.7 Opacity Permit Condition Relocation**

The opacity limit is in the facility-wide section and has been removed from the lumber drying kilns section to avoid duplication of permit conditions.

## ***Emissions Unit 3 – Oil and Edge-Seal Process***

### **8.8 Process Removed**

This section has been removed from the Tier I operating permit because the PTC for this process has been terminated and the process has been removed.

## **9. INSIGNIFICANT ACTIVITIES**

<b>Description</b>	<b>Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation</b>
ME-86 LDD Hurst boiler pop-off valve	a.i.77
ME-86 LDD Hurst boiler blow-down pit	a.i.80
ME-86 LDD hog-fuel pile	b.i.30
ME-86 LDD 500-gallon diesel tank	b.i.2
ME-86 LDD diesel fuel pump (electric)	b.i.2
ME-86 LDD maintenance welding	a.i.64 and b.i.9
ME-86 LDD ash house	b.i.30

## **10. ALTERNATIVE OPERATING SCENARIOS**

The facility did not request any alternative operating scenarios.

## **11. TRADING SCENARIOS**

The facility did not request any trading scenarios.

## **12. COMPLIANCE SCHEDULE**

### ***12.1 Compliance Certification***

Potlatch Forest Products Corporation in St. Maries is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

## **13. PERMIT REVIEW**

### ***13.1 Regional Review of Draft Permit***

DEQ provided the facility draft permit to its Coeur d'Alene Regional Office on November 9, 2007. No comments were received.

### ***13.2 Facility Review of Draft Permit***

DEQ provided the facility draft permit to Potlatch Forest Products Corporation, Lumber Drying Division, in St. Maries, on November 9, 2007. Comments were received on December 18, 2007. Changes were made to the permit as follows:

The term “wood and wood waste” was changed to “wood residual” in Table 1.1 for Section 3 as requested.

Permit Condition 2.14, regarding the sulfur content of distillate fuel oil and coal, was removed because the facility does not use fuel oil or coal.

Permit Condition 2.15, regarding open burning, was removed because the facility cannot conduct open burns at the site.

The facility requested that Permit Conditions 3.9 and 3.10 be rewritten to exclude the phrase, “and operated as efficiently as practical.” These permit conditions are applicable requirements from the facility’s Tier II operating permit and cannot be modified without first modifying the Tier II operating permit. A Tier II modification requires a separate permit application and permitting process.

Permit Condition 3.12 was modified to clarify that the maintenance of the monitoring applies to the ESP.

The facility requested that Permit Conditions 3.1, 3.6, 3.7, 3.8, 3.20, and 3.21 be removed from Permit Condition 3.26. This permit condition was reworded as shown in Section 8 of this statement of basis.

The facility requested two changes to the insignificant activities list, which were made.

### **13.3 Public Comment**

DEQ is providing the draft permit for public comment. The states of Washington and Montana and the Coeur d’Alene Indian Reservation and the Nez Perce Indian Reservation are within 50 miles of this Tier I Source and are affected states. As such, notification of the public comment period is being provided as required by IDAPA 58.01.01.364.

## **14. ACID RAIN PERMIT**

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

## **15. REGISTRATION FEES**

This facility is a major facility as defined by IDAPA 58.01.01.008.10. Therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

## **16. RECOMMENDATION**

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommends that DEQ issue draft Tier I Operating Permit No. T1-2007.0103 to Potlatch Forest Products Corporation for its St. Maries Lumber Drying Division facility. This permit renews the facility’s existing Tier I operating permit. The permit is being made available for public comment as required by IDAPA 58.01.01.364. The project does not involve PSD permitting requirements.

CZ/hp Permit No. T1-2007.0103

# **APPENDIX A - AIRS DATA ENTRY FORM**

**Potlatch Forest Products Corporation  
St. Maries**

**Tier I Operating Permit No. T1-2007.0103**

**Facility ID No. 009-00030**

## AIRS/AFS DATA ENTRY FORM

This is for Facility ID No. 009-00001 and 009-00030, Combined  
AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	A						A	U
PM <sub>10</sub>	A						A	U
PT (Particulate)	A						A	U
VOC	A						A	U
Total HAPs	A						A	U
APPLICABLE SUBPART								

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).
- NA = Not applicable as defined in IDAPA 58.01.01.579, constructed prior to baseline dates.